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UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

PCR DISTRIBUTING CO., a company  
organized under the laws of California,

*Plaintiff*

vs.

JOHN DOES 1-20 d/b/a  
NHENTAI.NET,

*Defendants*

Case No. 2:24-cv-07453-FLA-AJR

**NHENTAI.NET'S REPLY IN  
SUPPORT OF MOTIONS TO  
DISMISS (FED. R. CIV. P. 12(b)(6))  
AND STRIKE (FED. R. CIV. P.  
12(f)); MEMORANDUM OF  
POINTS AND AUTHORITIES**

Date: February 7, 2025; 1:30 p.m.  
Place: Roybal Federal Building and  
U. S. Courthouse, Courtroom 6B,  
6th Floor, 255 E. Temple Street  
Los Angeles, California 90012  
Honorable Judge Fernando L. Aenlle-  
Rocha

**MEMORANDUM OF POINTS AND AUTHORITIES IN REPLY**

The operators of www.nhentai.net, i.e., the entity that owns www.nhentai.net (“Nhentai.net”), hereby file this Reply in Support of its Motions to Dismiss and Strike (“Motions”) Dkt. No. 31. Despite the fact that Plaintiff’s counsel mentioned that Plaintiff may amend its pleading, it did not do so prior to Nhentai.net’s January 6, 2025 deadline to file its responsive pleading. Plaintiff has since indicated in two Court filings that it intends to amend its pleading and that Nhentai.net’s Motions either have been or soon will be rendered moot. *See e.g.*, Dkt. Nos. 36 at 1 and Dkt. No. 37 at 7. Because Plaintiff has not amended its pleading, Nhentai.net’s Motions are not moot and remain ripe for decision by the Court.

Plaintiff failed to respond in any substantive way to the vast majority of the arguments set forth in the Motions, relying primarily on Plaintiff’s intention to amend its pleading. *Id.* Indeed, Plaintiff spent nearly a page of its response questioning the validity of this District’s Local Rule 7-12 which is about a party’s failure to respond to a motion to dismiss. *Id.* at 1-2.

The remainder of Plaintiff’s response does nothing to undercut the significant bases in Nhentai.net’s Motions that warrant dismissal of Plaintiff’s Complaint in its entirety and with prejudice pursuant to Federal Rule of Civil Procedure 12(b)(6). Nhentai.net has made an overwhelming showing of the impropriety in Plaintiff’s pleadings in this case and why Plaintiff should not be permitted to proceed.

Nhentai.net respectfully asks the Court to dismiss Plaintiff’s case in its entirety with prejudice and/or strike on the numerous bases described in Nhentai’s Motions and accompanying materials.

**DATED:** January 24, 2025

Respectfully submitted,

By: /s/ Jennifer M. Rynell

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**Attorneys for Nhentai.net**

**L.R. 11-6.2. CERTIFICATE OF COMPLIANCE**

The undersigned counsel of record for Nhentai.net certifies that this brief contains 276 words, which complies with the word limit of L.R. 11-6.1.

/s/ Jennifer M. Rynell

Jennifer M. Rynell

**CERTIFICATE OF SERVICE**

On January 24, 2025, I filed the foregoing document with the clerk of court for the U.S. District Court, Central District of California via CM/ECF. I hereby certify that I thereby have served the document on all counsel and/or pro se parties of record by a manner authorized by Federal Rule of Civil Procedure 5(b)(2) and the Local Rules.

/s/ Jennifer M. Rynell

Jennifer M. Rynell